

REMARKS

The present application includes claims 1-26. Claim 26 is new.

Claims 1-6 and 13-18 stand rejected under 35 U.S.C. 102(e) as being anticipated by Courtney (EP 0 967 584 A2).

Claims 7-12 and 19-25 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Courtney (EP 0 967 584 A2) in view of Steinberg et al. (U.S. patent 6,006,039).

Regarding claim 1, applicant respectfully traverses the rejection and states that the Examiner has not established a *prima facie* case of anticipation, since Courtney lacks at least one element of claim 1.

Claim 1 requires a surveillance unit including a slot for operationally receiving a memory card. This is not taught or suggested by Courtney. The Examiner stated that it is inherent that the hard disk drive of Courtney would have a slot for a memory card. Applicants respectfully submit that hard disk drives have memory hard-wired within them, as there is no intention, for example, to have the memory installed and/or replaced by the user. Adding a slot for receiving a memory card would add to the cost of the hard disk without any reason.

Applicants note that it would not be obvious to modify Courtney to include a slot. Courtney discloses a surveillance unit that includes a hard disk drive and is connected through a network to a central processor. Courtney is quite content with connection through a network to a central processor. One of the problems addressed by Courtney is "even if an owner is notified by a page or telephone call of a problem or other event of interest, there is no convenient way for the owner to determine whether the event represents a true problem or just a false alarm ..." (Column 3, lines 12-16). The use of the slot to view the images would require that a human supervisor go to the event location.

Many other considerations prevented people from using slots for memory cards in surveillance units. These considerations include, for example:

- preventing damage and/or image erasure by intruders;

- access to the images although the surveillance unit may be placed in locations beyond human reach;

- practical access to surveillance units which belong to a large network of units; and

- storing data amounts required for surveillance purposes.

In view of these considerations, surveillance units designed up to the filing date of the present application, to the best of applicants' knowledge, did not use slots for memory cards. Applicants note that PCMCIA cards were known at least since 1991, nine years before the filing

of the present application, as is evident from the document: "Chronology of hand-held computers", by Ken Polsson downloaded from <http://www.islandnet.com/~kpolsson/handheld/>.

Patents describing removable memories, but not in the context of the present invention, were filed at least in 1991-1992, for example:

US patent 5,234,351 to Dixon, filed December 7, 1992, and

US patent 5,251,082 to Elliott et al., filed June 13, 1991.

It was applicants' determination, as stated on page 2 of the present application, that the advantage of having a portable stand alone unit which does not require a wire connection or wireless transmission of images outweighs any disadvantages associated with the above considerations.

In addition, on page 9, lines 18-27, of the application, applicants have suggested methods to overcome some problems associated with the above considerations, which are unique to surveillance units.

Applicants had also determined that even if wire connections are provided, using an additional slot for a memory card would be advantageous, allowing a backup for cases in which an intruder intentionally damaged a wire connection (page 11, lines 10-13).

The dependent claims are allowable at least by virtue of their parent claims. Nonetheless, at least some of the claims add further patentability over Courtney. Claim 26, for example, requires that the slot is configured for removably receiving the memory card. This is not taught or suggested by Courtney.

Claim 19 requires storing operational data of a surveillance unit on a removable memory card and inserting the memory card into a predefined slot of the surveillance unit.

The Examiner stated that Steinberg discloses a method of controlling the operation of a camera unit, that Courtney discloses a surveillance unit that can be controlled by an external device and that it would be obvious to combine the references.

Applicants respectfully traverse the rejection and state that a *prima facie* case of lack of inventive step for this claim was not established, since the combination of the references would not result in the invention as claimed and the Examiner did not bring any teaching in the prior art to combine Steinberg and Courtney. In fact, the fields of portable digital cameras and surveillance units are quite different.

MPEP 2143 requires that the Examiner meet three basic criteria, for establishing a *prima facie* obviousness rejection. "First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art,

to modify the reference or to combine reference teachings. ... The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, not in applicant's disclosure."

The Examiner has not provided any suggestion or motivation in the prior art to combine the references. While portable cameras are generally held by their owners and are easily accessible for receiving a storage device, surveillance units are generally not held by their owners and in many cases are placed in out-of-reach locations. Therefore, in the art, surveillance units are generally configured through wire or wireless connection to a control station.

Furthermore, while cameras are generally used under many different conditions and for various tasks and therefore require a facility to modify the operating system and behavioral parameters in the field (Steinberg (Col. 1, lines 52-56)), surveillance units are generally used in a single location, for a single task and do not require frequent changes in configuration.

In addition, applicants are not aware of surveillance units that have the ability to use different operating systems. In general, the configuration of surveillance units was considered much simpler than the configuration of a camera as presented by Steinberg.

Accordingly, even if the Examiner is correct in stating that it is desirable to have a stand alone surveillance unit, there is no reason to assume that it will be configured differently than by the methods discussed on page 2, lines 10-16 of the present application, either by connecting a monitor or by a control panel on the surveillance unit.

Applicants further note that a combination of Steinberg and Courtney would not result in the invention of claim 19. Col. 4, lines 34-45, of Courtney relate to a control section on the system, which receives images from a detector. The portable unit is used to change characteristics on the control section and not on the detector. Therefore, even if the wireless communication link of Courtney were replaced with a memory insertion act, a replacement which is not taught or suggested by the art and lacks any motivation, the memory would be inserted into a slot of the control station and not in the surveillance unit.

The dependent claims are allowable at least by virtue of their parent claims.

In view of the above remarks, applicants submit that the claims are patentable over the prior art. If the Examiner does not agree regarding one or more of the claims, but is of the opinion that a telephone conversation may forward the present application toward allowance, applicants respectfully request that the Examiner call the undersigned at 1 (877) 428-5468. Please note that this is a direct *toll free* number in the US that is answered in the undersigned's

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Israel office. Israel is 7 hours ahead of Washington. Our normal work week is Sunday through Thursday.

Respectfully submitted,
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